RCRA Subtitle I Inspection Report

UST Compliance Inspection

PEPCO Kenilworth Fueling Station
3400 Benning Road, NE
Washington, DC 20010

Telephone Number: 202-331-6641

Date of Inspection: June 5, 2007

Facility Identification Number: 9000745

EPA Representative:	Heather Wright (Contractor), Environmental Scientist, 703-841-0547
Tank Owner:	PEPCO – Potomac Electric Power Company
Tank Owner Representative:	Fariba Mahvi, Senior Engineer, 202-331-6641

Heather Wright

Heather Wright

6/15/07
Date

Background

On June 5, 2007, the United States Environmental Protection Agency (EPA), Region 3, Office of Enforcement, RCRA Compliance and Enforcement Branch, represented by its contractor personnel, Heather Wright of ERG, conducted a Compliance Evaluation Inspection (CEI) of the PEPCO Kenilworth Fueling Station located at 3400 Benning Road, NE in Washington, DC to determine the extent of compliance with Subtitle I of the Resource Conservation and Recovery Act (RCRA). PEPCO maintains three additional USTs at the 3400 Benning Road complex; however, these tanks are registered under different Facility ID numbers (#7000585 - two 20,000-gallon tanks and #9000746 - one 15,000-gallon tank) and were not included in this inspection.

Inspection Observations

Inspection Procedures. EPA Work Assignment Manager, Joanne Cassidy, contacted a representative of this facility on May 17, 2007 to schedule an inspection. Ms. Wright conducted the inspection on June 5, 2007. Upon arrival at the facility, Ms. Wright presented her credentials to Ms. Fariba Mahvi, Senior Engineer, and explained the scope and purpose of the inspection. Additional facility personnel present during the inspection included Mr. Skip Pierce, Equipment Coordinator/Operations Support, and Mr. Gary Gordon, Fleet Supervisor. After completing the inspection, Ms. Wright completed the Region 3 Underground Storage Tank (UST) Checklist, which is included as Attachment 1 to this report.

Tank Descriptions. The facility maintains and operates one UST under Facility ID #9000745 (see Table 1) to supply fuel for company vehicles. According to the facility's notification to the District of Columbia Environmental Health Administration, the tank is steel covered with epoxy, and supplies fuel to two dispensers via double-walled flexible plastic piping. See Photograph #1 in Attachment 2 for an overview of the UST pad and adjacent fuel pumps.

Table 1
UST and Piping Details for PEPCO Kenilworth Fueling Station

Tank No.	Material Stored	Capacity (gal.)	Installation Date	Tank Construction Material	Piping Construction Material
1	Gasoline	20,000	05/1979	Steel w/epoxy coating	Double-walled Geoflex (flexible plastic)

Tank Release Detection. A Veeder-Root TLS-350R monitoring system provides Automatic Tank Gauging (ATG) release detection for the tank. No alarms were

observed during the inspection. Facility personnel provided daily ATG printouts for the previous 12 months. According to facility personnel, a leak detection test (0.2 gallons per hour test) is run approximately every two weeks. The EPA inspector reviewed the records and did not find any failures in the past year with the exception of low inventory alarms. Attachment 3 contains copies of ATG leak detection test printouts for the past two months.

According to facility personnel, someone from fleet maintenance checks the Veeder-Root monitor every day for the presence of alarms and to record the tank inventory. If the person checking the system finds that it is not working properly, Mr. Gordon is notified, who in turn notifies Mr. Pierce to contact the maintenance company.

Facility management also has tank tightness testing conducted occasionally. The EPA inspector reviewed the most recent tank tightness test results (performed in 2003 by Precision Testing Inc.), which indicated that the tank passed.

Piping Release Detection. The EPA inspector visually inspected the UST system and confirmed the presence of a pressurized piping system. Facility management uses an electronic automatic line leak detector (ALLD) and annual line tightness testing for release detection for the pressurized piping. Facility management maintains annual test results on site back to 2001. All show a passing result. Attachment 4 contains a copy of the last functionality test of the ALLD in September 2006.

The EPA inspector visually inspected the access sump and found it to be clean and dry (see Photograph #2 in Attachment 2). A liquid sump sensor was observed to be present and properly positioned. The EPA inspector tested the sensor, which triggered an alarm on the ATG and pump shut down (see ATG printout in Attachment 5).

Spill/Overfill Prevention. The EPA inspector observed an overfill cut-off valve in the tank fill pipe, as well as a spill bucket in place and in good condition. In addition, the tank is equipped with a high-level alarm adjacent to, and in sight of, the fill area (see Photograph #3 in Attachment 2). The alarm sounded when tested.

Cathodic Protection. An impressed current system is utilized to protect the steel tank from corrosion. According to facility personnel, someone from fleet maintenance checks the volt meter every day to verify that the system is operating and shows a negative voltage of 0.85 volts. If the person checking the system finds that it is not working properly, Mr. Gordon is notified, who then notifies Mr. Pierce to contact the company who maintains/tests the system. In addition, the system is tested by a qualified cathodic protection tester on an annual basis. Attachment 6 contains a copy of the last test conducted in September 2006. Facility management maintain annual test results on site for the cathodic protection system back to 1995. All show that the cathodic protection system is operating properly.

Financial Assurance. The facility is guaranteed/insured through Associated Electric & Gas Insurance Services Limited (AEGIS) in East Rutherford, New Jersey. Attachment 7 includes a copy of the UST insuring agreement/financial responsibility endorsement.

Used Oil. The facility generates used oil on site from vehicle maintenance operations. The used oil is stored in a 500-gallon aboveground tank located outside of Building #75, the fleet maintenance building.

Attachments

1. Region 3 UST Compliance Checklist
2. Photo log
3. ATG Leak Test Printouts (June 2007 and May 2007)
4. Functionality Test for ALLD (September 2006)
5. ATG Printout Showing Sump Sensor Alarm (June 5, 2007)
6. Cathodic Protection System Test Results (September 2006)
7. UST Insuring Agreement/Financial Responsibility Endorsement

Attachment 1. Region 3 UST Compliance Checklist

Leak Detection Inspection

I. Ownership of Tank(s)	II. Location of Tank(s)
PEPCO - Potomac Electric Power Company 701 9th Street NW, 6th Floor Washington, DC 20068	3400 Benning Rd., NE Washington, DC 20010 Number of Tanks at This Location: 1

III. Tank Information

Complete for each tank. If facility has more than 4 tanks, photocopy page and complete information for additional tanks.

Tank presently in use (circle)	Tank 1	Tank 2	Tank 3	Tank 4
If not, date last used	—			
If emptied, verify 1" or less of product in tank	—			
Month and Year Tank Installed	05/1979			
Material of Construction tank/pipe	Epoxy coated steel/ DW graded			
Capacity of Tank (in gallons)	20,000			
Substance Stored	gasoline			

IV.A. Release Detection For Tanks

Check the release detection method(s) used for each tank or N/A if none required

Manual Tank Gauging (tanks under 1,000 gal.)				
Manual Tank Gauging and Tank Tightness Testing (tanks under 2,000 gal.)				
Tank Tightness Testing and Inventory Control				
Automatic Tank Gauging	✓			
Vapor, Groundwater or Interstitial Monitoring				
Other approved method (SIR)				

IV.B. Release Detection For Piping

Check the release detection method(s) used for piping

Check Pressurized (P) or Suction (S) Piping for each tank	P			
Automatic Line Leak Detectors, **and** check one	✓			
Vapor or Groundwater Monitoring				
Secondary Containment with Monitoring				
Line Tightness Testing	✓			

I Heather Wright (print name) certify that I have inspected the above named facility on 6/5/07 (month/day/year)

Inspector's Signature: Heather Wright Date: 6/5/07

Leak Detection for

Pressurized Piping. A method must be selected from each set. Where applicable indicate date of last test. If this facility has more than 4 tanks, please photocopy this page and complete information for all additional piping.

Set 1	Tank 1	Tank 2	Tank 3	Tank 4
Automatic Flow Restrictor				
Automatic Shut-off Device	✓			
Continuous Alarm System				
and				
Set 2				
Annual Line Tightness Testing	✓			
Interstitial Monitoring				
If Interstitial Monitoring, documentation of monthly monitoring is available				
Ground-Water or Vapor Monitoring				
If Ground-Water or Vapor Monitoring, documentation of monthly monitoring is available				
Other Approved Method (specify in comments section)				
Suction Piping. Indicate date of most recent test.				
Line Tightness Testing (required every 3 years)				
Secondary Containment with Interstitial Monitoring				
Ground-Water or Vapor Monitoring				
Other Approved Method (specify in comments section)				
No Leak Detection Required (must answer yes to all of the following questions)				
Operates at less than atmospheric pressure				
Has only one check valve, which is located directly under pump				
Slope of piping allows product to drain back into tank when suction released				
All above information on suction piping is verifiable				

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: Electronic MLD is utilized in conjunction with line tightness testing.

Inspector's Signature: Heather Wright Date: 10/8/07

Inventory Control and Tank Tightness

Method of tank tightness testing: N/A

Address of tank tightness tester: N/A

Please complete all information for each tank If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Date of last tank tightness test.				
Did tank pass test? Indicate yes or no. If no, specify in comments section below the status of the tank or what actions have been taken (e.g., has state been notified?)				
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.				
Overages or shortages are less than 1% + 130 gals of tank's flow-through volume.				
If no, which months were not?				

Please answer yes or no for each question

Owner/operator can explain inventory control methods and figures used and recorded.	Yes ☐	No ☐
Records include monthly water monitoring.	Yes ☐	No ☐
Tank inventory reconciled before and after fuel delivery.	Yes ☐	No ☐
Books are reconciled monthly.	Yes ☐	No ☐
Appropriate calibration chart is used for calculating volume.	Yes ☐	No ☐
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes ☐	No ☐
The drop tube in the fill pipe extends to within one foot of tank bottom.	Yes ☐	No ☐
Owner can demonstrate consistency in dipsticking techniques.	Yes ☐	No ☐
The dipstick is long enough to reach the bottom of the tank.	Yes ☐	No ☐
The ends of the gauge stick are flat and not worn down.	Yes ☐	No ☐
The dipstick is marked legibly & the product level can be determined to the nearest 1/8th inch.	Yes ☐	No ☐
The tank has been tested within the year & has passed the tightness test (if necessary).	Yes ☐	No ☐
A third-party certification of the tank tightness test method is available.	Yes ☐	No ☐
Tank tester complied with all certification requirements.	Yes ☐	No ☐
Monitoring and testing are maintained and available for the past 12 months.	Yes ☐	No ☐

Comments: _____

Inspector's Signature: Heather Wright Date: 10/5/07

Vapor Monitoring

Name of monitoring device: N/A

Date system installed _____ Number of monitoring wells _____

Distance of monitoring well(s) from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by: _____

Location of site assessment documentation: _____

Please indicate yes or no for each tank Please complete all information for each tank. If facility has more than 4 tanks, please photocopy this page and complete the information for additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Well is clearly marked and secured.				
Well caps are tight.				
Well is constructed so that monitoring device is not rendered inoperative by moisture or other interferences.				
Well is free of debris or has other indications that it has been recently checked.				

Please answer yes or no for each question

UST excavation zone was assessed prior to vapor monitoring system installation.	Yes ☐	No ☐
One or more USTs is/are included in system.	Yes ☐	No ☐

If the system is automatic, check the following:

Power box is accessible and power light is on.	Yes ☐	No ☐
Documentation of monthly readings is available for last 12 months.	Yes ☐	No ☐
Equipment used to take readings is accessible and functional.	Yes ☐	No ☐
Vapor monitoring equipment has been calibrated within the last year.	Yes ☐	No ☐

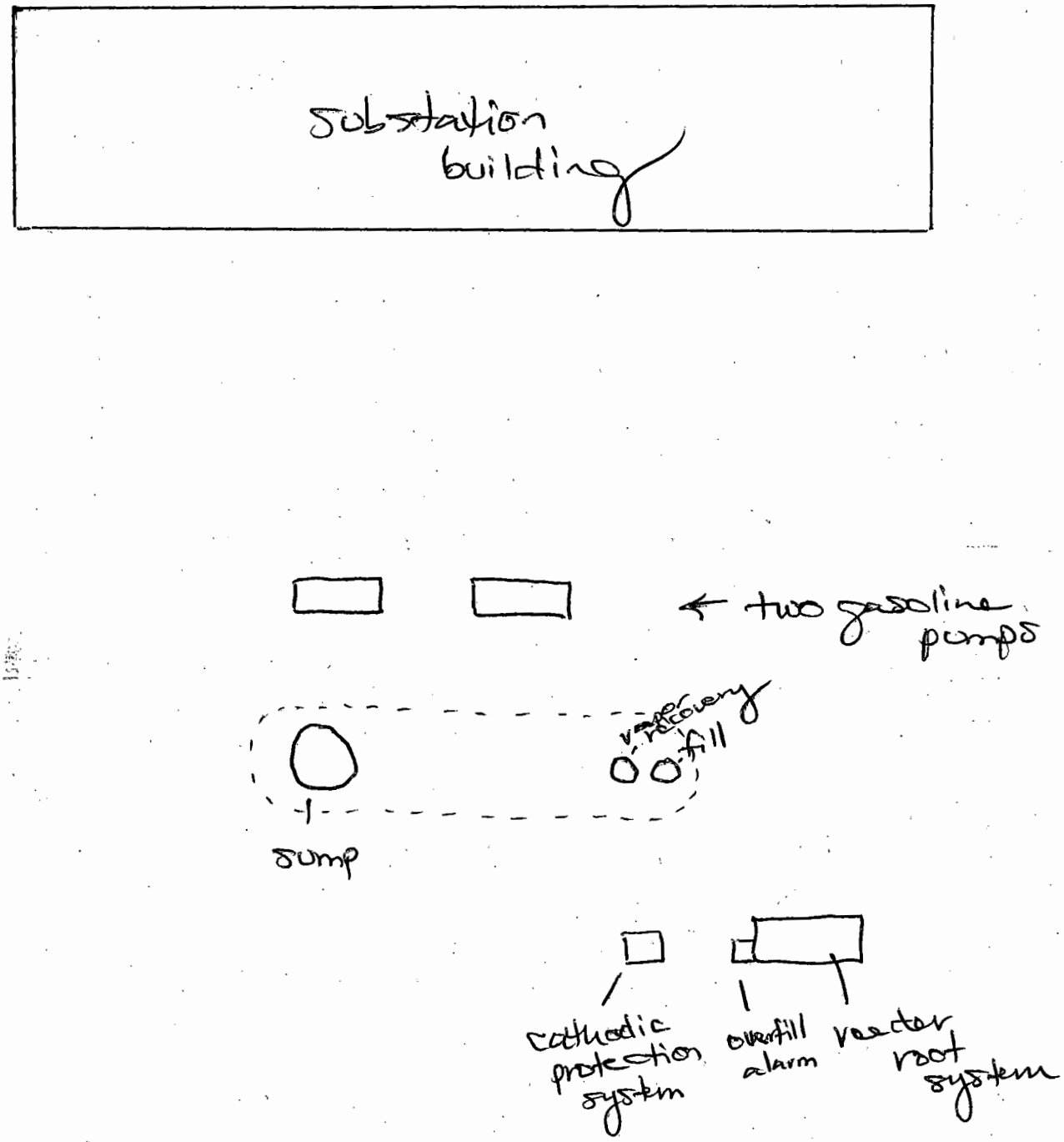
If the system is manual, check the following:

Documentation of monthly readings is available for last 12 months.	Yes ☐	No ☐
Equipment used to take readings is accessible and functional.	Yes ☐	No ☐
Vapor monitoring equipment has been calibrated within the last year.	Yes ☐	No ☐
Porous material was used for backfill.	Yes ☐	No ☐
Wells are placed within the excavation zone.	Yes ☐	No ☐
Level of background contamination is known. If so -- what is level?	Yes ☐	No ☐

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: _____

Inspector's Signature: Heather Wright Date: 6/5/07



Heather Wright 6/5/07

Manual Tank Gauging

Manual tank gauging may be used as the sole method of leak detection only for tanks of 1,000 gal. or fewer or in combination with tank tightness testing for tanks of up to 2,000 gal.

Please indicate the number of the tank or tanks for which manual tank gauging is used as the main leak detection method (e.g., tanks 1 & 4): N/A

Please answer yes or no for each question		
Records show liquid level measurements are taken at beginning and end of period of at least ([Circle one] 36, 44, 58) hours during which no liquid is added to or removed from the tank.	Yes ☐	No ☐
Level measurements are based on average of two consecutive stick readings at both beginning and end of period.	Yes ☐	No ☐
Monthly average of variation between beginning and end measurements is less than standard shown below for corresponding size and dimensions of tank and waiting time.	Yes ☐	No ☐
Gauge stick is long enough to reach bottom of the tank. Ends of gauge stick are flat and not worn down.	Yes ☐	No ☐
Gauge stick is marked legibly and product level can be determined to the nearest one-eighth of an inch.	Yes ☐	No ☐
MTG is used as sole method of leak detection for tank.	Yes ☐	No ☐
MTG is used in conjunction with tank tightness testing.	Yes ☐	No ☐
Are all tanks for which MTG is used under 2,000 gallons in capacity?	Yes ☐	No ☐
Are monitoring records available for the last 12 month period?	Yes ☐	No ☐

Check One	Nominal Tank Capacity (in gallons)	Tank Dimensions	Monthly Standard (in gallons)	Minimum Test Duration
( )	110-550	N/A	5	36 hours
( )	551 - 1,000*	N/A	7	36 hours
( )	1,000*	64" diameter x 73" length	4	44 hours
( )	1,000*	48" diameter x 128" length	6	58 hours
( )	1,001 - 2,000*	N/A	13	36 hours

* Manual tank gauging must be used in combination with tank tightness testing for tanks over 550 gal. and up to 2,000 gal.

Comments: _____

Inspector's Signature: Heather Wright Date: 6/5/07

Ground Water Monitoring

Date System Installed: N/A

Distance of well from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Distance of well from piping (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by: _____

Location of site assessment documentation: _____

Please answer each question of each well If there are more than 4 wells, please photocopy this page and complete the information for all additional wells.

	Well 1	Well 2	Well 3	Well 4
Well is clearly marked and secured to avoid unauthorized access or tampering.				
Well was opened and presence of water was observed in well at depth of _____ ft.				

Please answer yes or no for each question

Wells are used to monitor piping.	Yes ☐	No ☐
Site assessment was performed prior to installation of wells.	Yes ☐	No ☐
Documentation of monthly readings is available.	Yes ☐	No ☐
Specific gravity of product is less than one.	Yes ☐	No ☐
Hydraulic conductivity of soil between UST system and monitoring wells is not less than 0.01 cm/sec. According to:	Yes ☐	No ☐
Groundwater is not more than 20 feet from ground surface.	Yes ☐	No ☐
Wells are sealed from the ground surface to top of filter pack.	Yes ☐	No ☐
Continuous monitoring device or manual bailing method used can detect the presence of at least one-eighth of an inch of the product on top of groundwater in well.	Yes ☐	No ☐
Groundwater is monitored: ( ) Manually on a monthly basis. ( ) Automatically (continuously or monthly basis [Circle one]).		
Check the following if groundwater is monitored manually: Bailer used is accessible and functional.	Yes ☐	No ☐
Check the following if groundwater is monitored automatically: Monitoring box is operational.	Yes ☐	No ☐
Checked for presence of sensor in monitoring well.	Yes ☐	No ☐

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: _____

Inspector's Signature: Heather Wright Date: 6/8/07

Interstitial Monitoring

Manufacturer and name of system: _____

Date system installed: N/A

Materials used for secondary barrier: _____

Materials used for internal lining: _____

Interstitial space is monitored (Circle one): automatically, continuously, monthly basis.

Please answer yes or no for each question			
All tanks in system are fitted with secondary containment and interstitial monitoring.	Yes ☐	No ☐	N/A ☐
System is designed to detect release from any portion of UST system that routinely contains product.	Yes ☐	No ☐	N/A ☐
Monitoring method is documented as capable of detecting a leak as small as .1 gal./hr. with at least a 95% probability of detection and a probability of false alarm of no more than 5%.	Yes ☐	No ☐	N/A ☐
Documentation of monthly readings is available for last 12 months.	Yes ☐	No ☐	N/A ☐
Maintenance and calibration documents and records are available and indicate appropriate maintenance procedures for system have been implemented.	Yes ☐	No ☐	N/A ☐
Monitoring box, if present, is operational.	Yes ☐	No ☐	N/A ☐
If monitoring wells are part of leak detection system, monitoring wells are clearly marked and secured to avoid unauthorized access and tampering.	Yes ☐	No ☐	N/A ☐
Interstitial space is monitored manually on monthly basis (answer the following question).	Yes ☐	No ☐	N/A ☐
Equipment used to take readings is accessible and functional.	Yes ☐	No ☐	N/A ☐
Tank is double-walled	Yes ☐	No ☐	N/A ☐
Tank is fitted with internal bladder to achieve secondary containment (answer the following question).	Yes ☐	No ☐	N/A ☐
Bladder is compatible with substance stored and will not deteriorate in the presence of that substance.	Yes ☐	No ☐	N/A ☐
Excavation is lined with impervious artificial material to achieve secondary containment (answer the following questions).	Yes ☐	No ☐	N/A ☐
Secondary barrier is always above groundwater.	Yes ☐	No ☐	N/A ☐
If secondary barrier is not always above groundwater, secondary barrier and monitoring designs are for use under such conditions.	Yes ☐	No ☐	N/A ☐
Secondary barrier is constructed from artificially constructed material, with permeability to substance < 10^{6} cm/sec.	Yes ☐	No ☐	N/A ☐
Secondary barrier is compatible with the regulated substances stored and will not deteriorate in presence of that substance.	Yes ☐	No ☐	N/A ☐
Secondary barrier does not interfere with operation of cathodic protection system.	Yes ☐	No ☐	N/A ☐

Comments: _____

Inspector's Signature: Heather Wright Date: 6/8/07

Automatic Tank Gauging

Manufacturer, name and model number of system: Veeder Root TLS350R

Please answer yes or no for each question		
Device documentation is available at site (e.g., manufacturer's brochures, owner's manual).	Yes ☑	No
Device can measure height of product to nearest one-eighth of an inch.	Yes ☑	No
Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch.	Yes ☑	No
Documentation is available that the ATG was in test mode a minimum of once a month.	Yes ☑	No
Checked for presence of gauge in tanks.	Yes ☑	No
Checked for presence of monitoring box and evidence that device is working (i.e., device is equipped with roll of paper for results documentation).	Yes ☑	No
Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with probability of detection of 95% and probability of false alarm of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods").	Yes ☑	No
Checked documentation that system was installed, calibrated, and maintained according to manufacturer's instructions.	Yes ☑	No
Maintenance records are available upon request.	Yes ☑	No
Monthly testing records are available for the past 12 months.	Yes ☑	No
Daily monitoring records are available for the past 12 months (if applicable).	N/A Yes ☐	No

Comments: ATG is used as primary leak detection for tank. However, tank tightness testing has also been performed.

Inspector's Signature: Heather Wright Date: 6/8/07

Statistical Inventory Reconciliation

Please complete all information for each tank. If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.	W/A		

Please answer yes or no for each question

Records include monthly water monitoring.	Yes ☐	No ☐
Tank inventory reconciled before and after fuel delivery.	Yes ☐	No ☐
Appropriate calibration chart is used for calculating volume.	Yes ☐	No ☐
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes ☐	No ☐
The drop tube in the fill pipe extends to within one foot of tank bottom.	Yes ☐	No ☐
Answer one of the following three:		
1) Owner can demonstrate consistency in dipsticking techniques.	Yes ☐	No ☐
a) The dipstick is long enough to reach the bottom of the tank.	Yes ☐	No ☐
b) The end of the gauge stick is flat and not worn down.	Yes ☐	No ☐
c) The dipstick is legible & the product level can be determined to the nearest 1/8th inch.	Yes ☐	No ☐
OR		
2) Automatic tank gauge is used for readings.	Yes ☐	No ☐
OR		
3) Other method is used for readings (explain in comment section below).	Yes ☐	No ☐
A third-party certification of the SIR method is available.	Yes ☐	No ☐
Monitoring and testing records are maintained and available for the past 12 months.	Yes ☐	No ☐

Comments: _____

Inspector's Signature: Heather Wright Date: 6/5/07

Spill/Overfill Prevention

	Tank 1	Tank 2	Tank 3	Tank 4
Are all tank transfers less than 25 gallons?	Yes ☐ No ☑	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Spill Prevention				
Is there a spill bucket (at least 5 gallons) or another device that will prevent release of product to the environment (such as a dry disconnect coupling)?	Yes ☑ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Overfill Prevention				
What device is used to prevent tank from being overfilled?				
Ball float valve	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Butterfly valve (in fill pipe)	Yes ☑ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Automatic alarm monitoring is used	Yes ☑ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Other alarm system	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐

DOES THE FACILITY HAVE A FINANCIAL ASSURANCE MECHANISM? YES ✓ NO ___ (PROVIDE COMMENTS AS TO COMPLIAN STATUS FOR 40 C.F.R. PART 280 SUBPART

Insured through AEGIS - copy provided.

Cathodic Protection

	Tank 1	Tank 2	Tank 3	Tank 4
Sacrificial Anode System				
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
The last two test results are available. (Tests are required every three years.)	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Impressed Current				
Rectifier is on 24 hours a day?	Yes ☑ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
The last two test results are available? (Tests are required every 60 days.)	Yes ☐ No ☑	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes ☑ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐

Comments: Impressed current system is utilized. According to facility personnel, someone from fleet maintenance checks the volt meter to make sure it meets the -850 millivolt requirement. However, this is not documented. In addition, Piping & Corrosion Specialis Inc. is contract annually c conduct a test of th cathodic protection

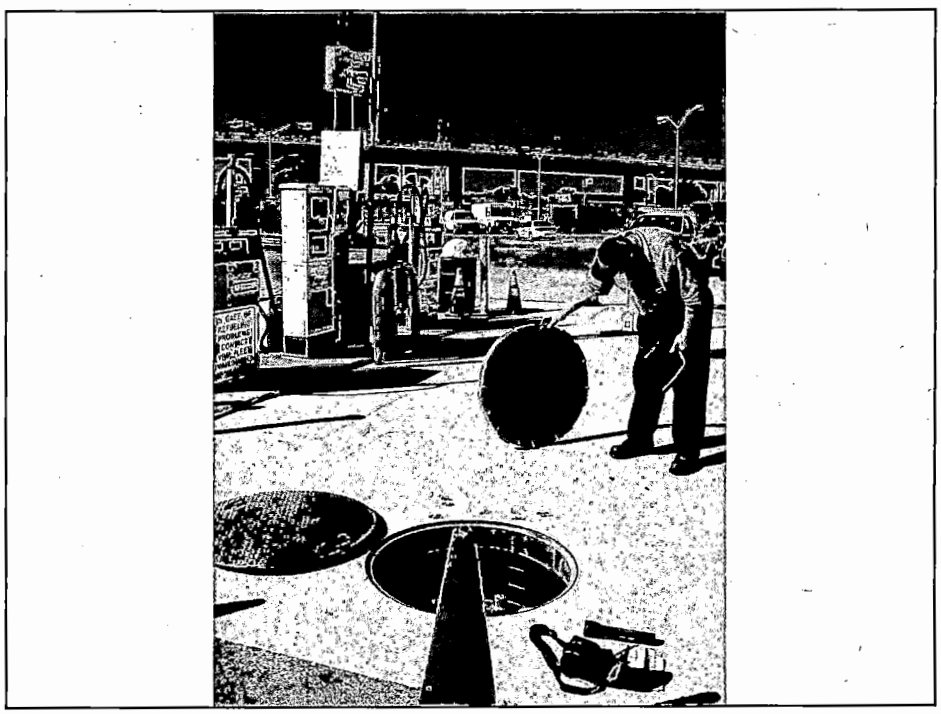
Inspector's Signature: Heather Wright Date: 6/8/07

Attachment 2. Photo log

Washington, DC
PHOTO LOG

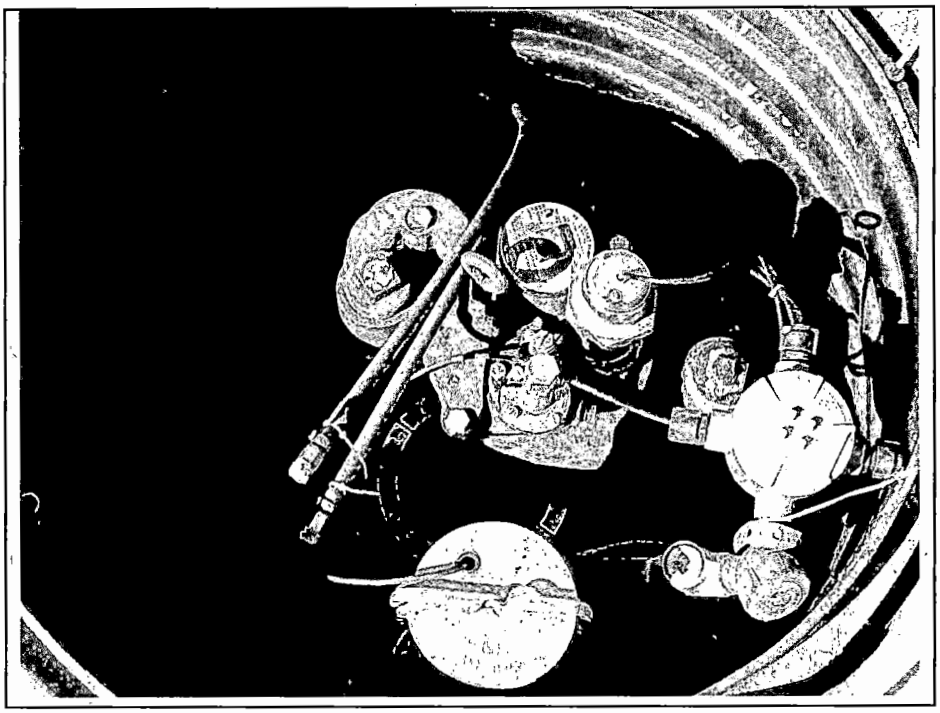
DATE TAKEN: 6/05/07
TAKEN BY: H. Wright
PHOTO #: 1
COMMENTS: Site overview: UST pad and adjacent fuel pumps. Access sump in foreground; fill port in background.

SITE LOCATION: UST pad – East side of substation



DATE TAKEN: 6/05/07
TAKEN BY: H. Wright
PHOTO #: 2
COMMENTS: Access sump.

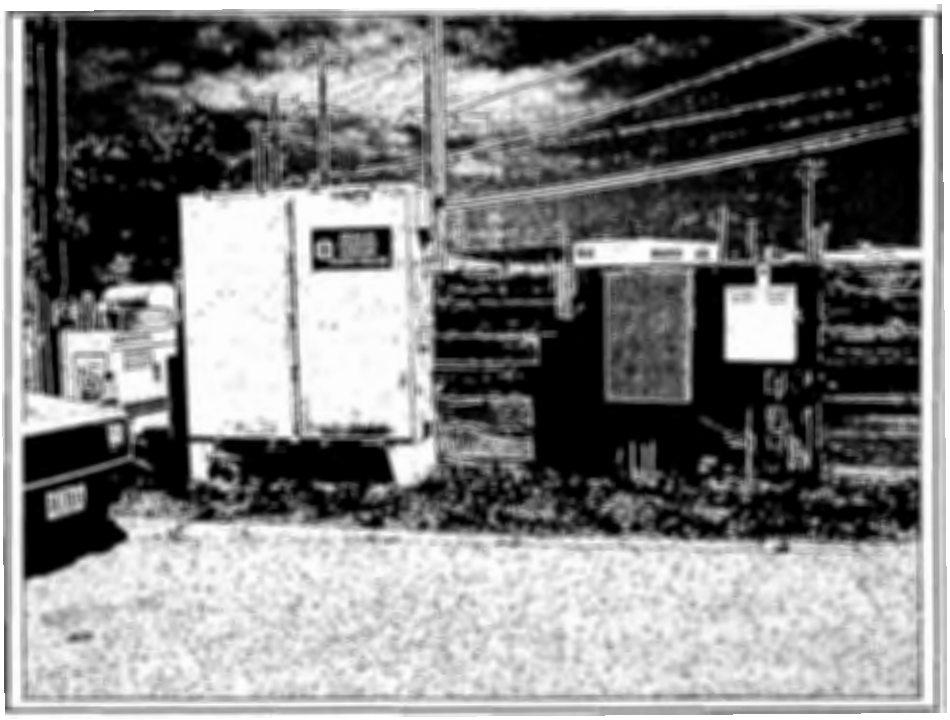
SITE LOCATION: UST pad – East side of substation



Washington, DC
PHOTO LOG

DATE TAKEN: 6/05/07
TAKEN BY: H. Wright
PHOTO #: 3
COMMENTS: Veeder-Root system and alarm box (locker on left side of photo) and cathodic protection monitoring system (white box on right side of photo).

SITE LOCATION: Grassy area adjacent to/east side of UST pad



Attachment 3. ATG leak test printouts (June 2007 and May 2007)

258179 PEPCO

WASHINGTON DC
SITE KENILWORTH

JUN 4, 2007 7:44 AM

SYSTEM STATUS REPORT

ALL FUNCTIONS NORMAL

INVENTORY REPORT

T 1:UNLEADED
VOLUME = 15390 GALS
ULLAGE = 3543 GALS
90% ULLAGE= 1649 GALS
TC VOLUME = 15320 GALS
HEIGHT = 90.24 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 66.4 DEG F

* * * * * END * * * * *

WATER = 0.00 INCHES
TEMP = 69.1 DEG F

* * * * * END * * * * *

Inventory and Monthly Inspections
02

DAILY FUEL CHECK:
BENNING

STICK READINGS

	BEFORE	AFTER
	76.9	
	71.1	

KENILWORTH

#1 UNLEADED	90.2	

CHECKED BY: John Webb DATE: Jun 4 2007

WATER LEVEL GALLONS: _____ DATE CHECKED: _____

PROPANE READING: 70%

WASHINGTON DC
SITE KENILWORTH

JUN 2, 2007 8:00 AM

CSLD TEST RESULTS

JUN 2, 2007 8:00 AM

T 1:UNLEADED
PROBE SERIAL NUM 74788

0.2 GAL/HR TEST
PER: JUN 2, 2007 PASS

----- SYSTEM ALARM -----
CLOSE DAILY PENDING
JUN 3, 2007 2:00 AM

258179 PEPCO

2	80728
5	67443
6	45547
1	50080
2	71965
3	107388
4	62074

258179 PEPCO
WASHINGTON DC
SITE KENILWORTH
MAY 1, 2007 8:00 AM

CSLD TEST RESULTS
MAY 1, 2007 8:00 AM

T 1:UNLEADED
PROBE SERIAL NUM 747889
0.2 GAL/HR TEST
PER: MAY 1, 2007 PASS

---- SYSTEM ALARM ----
CLOSE DAILY PENDING
MAY 2, 2007 2:00 AM

258179 PEPCO
WASHINGTON DC
SITE KENILWORTH
MAY 2, 2007 2:00 AM

DAILY RECONCILIATION
T 1:UNLEADED
OPENING DATE & TIME:
MAY 1, 2007 2:00 AM
CLOSING DATE & TIME:

DAILY FUEL CHECK SHEET
BENNING

TANK TYPE	STICK READINGS BEFORE	AFTER	PUMP NUMBER	TOTALIZE READINGS
GARAGE				
#1 UNLEADED	58 IN	NA	3	D90688
			4	044511
#2 DIESEL	66 IN	NA	1	036328
			2	078691
			5	065267
			6	044678
KENILWORTH				
#1 UNLEADED	94 IN	NA	1	048411
			2	D69274
			3	103744
			4	060987

CHECKED BY: James Merkel DATE: 5/2/07

	BENN GAS	BENN Diesel	KEN GAS
WATER LEVEL GALLONS:	-0-	-1 IN	-0-

DATE CHECKED: 5/2/07

PROPANE READING: 75%

Attachment 4. Functionality test of ALLD system (September 2006)

Precision Testing, Inc.

♦♦♦

4437 Southern Business Park Drive ♦ White Plains, MD 20695
Phone 301/870-2246 ♦ Fax 301/870-2256

LTD-890 Leak Detector Test Record

Site: Kenilworth Pepco
3400 Benning Road
N.E. Wash. DC. 20019

Date: 6-27-2006
Technician Edward D. Dailey Jr

Submersible Pump Identification

Manufacturer	Model No.	Serial Number
Red Jacket - Both		

Leak Detector Identification

Manufacturer: Vaporless - FX1D - Both

Description
Diaphragm-type ____
Piston-type ✓

Other Style Leak Detector ____

Product: Regular
Leak Detector in Submersible Pump
Test at Dispenser: 1 & 2
1. Operating Pump Pressure 32 psi (para. 15)
2. Gallons per hour rate 3 (para. 22)
3. Lines pressure with pump shut off 19 psi (para. 23)
4. Bleedback Test with pump off ____ ml (para. 26)
5. Step-through time to full flow 4 seconds (para. 30)
6. Leak detector stays in leak search position. (para 42) Yes ✓ No ____

LEAK DETECTOR TEST

PASS ✓ FAIL ____ Retest ____

Serial # ____

Product: ____
Leak Detector in Submersible Pump
Test at Dispenser: ____
1. Operating Pump Pressure ____ psi (para. 15)
2. Gallons per hour rate ____ (para. 22)
3. Lines pressure with pump shut off ____ psi (para. 23)
4. Bleedback Test with pump off ____ ml (para. 26)
5. Step-through time to full flow ____ seconds (para. 30)
6. Leak detector stays in leak search position. (para 42) Yes ____ No ____

LEAK DETECTOR TEST

PASS ____ FAIL ____ Retest ____

Serial # ____

Product: ____
Leak Detector in Submersible Pump
Test at Dispenser: ____
1. Operating Pump Pressure ____ psi (para. 15)
2. Gallons per hour rate ____ (para. 22)
3. Lines pressure with pump shut off ____ psi (para. 23)
4. Bleedback Test with pump off ____ ml (para. 26)
5. Step-through time to full flow ____ seconds (para. 30)
6. Leak detector stays in leak search position. (para 42) Yes ____ No

LEAK DETECTOR TEST

PASS ____ FAIL ____ Retest ____

Serial # ____

Product: ____
Leak Detector in Submersible Pump
Test at Dispenser: ____
1. Operating Pump Pressure ____ psi (para. 15)
2. Gallons per hour rate ____ (para. 22)
3. Lines pressure with pump shut off ____ psi (para. 23)
4. Bleedback Test with pump off ____ ml (para. 26)
5. Step-through time to full flow ____ seconds (para. 30)
6. Leak detector stays in leak search position. (para 42) Yes ____ No

LEAK DETECTOR TEST

PASS ____ FAIL ____ Retest ____

Serial # ____

Note: Pass – Leak detector passes test protocol
Fail – Leak detector fails test protocol

Attachment 5. ATG printout showing sump sensor alarm (June 5, 2007)

PRESSURE LINE LEAK ALARM
Q 1:UNLEADED
PLLD SHUTDOWN ALARM
JUN 5, 2007 9:16 AM

----- SENSOR ALARM -----
L 1:UNLEADED STP SUMP
STP SUMP
FUEL ALARM
JUN 5, 2007 9:16 AM

258179 PEPCO

WASHINGTON DC
SITE KENILWORTH

JUN 5, 2007 9:23 AM

- - - - - - - - - - - - - - -
NO SHIFT TIME SET

* * * * * END * * * * *

258179 PEPCO

WASHINGTON DC
SITE KENILWORTH

JUN 5, 2007 9:24 AM

INVENTORY REPORT

T 1:UNLEADED
VOLUME = 14955 GALS
ULLAGE = 3978 GALS
90% ULLAGE= 2084 GALS
TC VOLUME = 14884 GALS
HEIGHT = 87.79 INCHES
WATER VOL = 0 GALS
WATER = 0.00 INCHES
TEMP = 66.7 DEG F

* * * * * END * * * * *

Attachment 6. Cathodic protection system test results (September 2006)

PIPING & CORROSION SPECIALTIES INC.

P.O. BOX 10 • PASADENA, MARYLAND 21123

BALTIMORE (410) 544-3232 • FAX (410) 544-1600 • WASHINGTON METRO (301) 261-1590

September 29, 2006

PEPCO
8400B Old Marlboro Pike
Upper Marlboro, Maryland 20772

Attn: Shirley Fletcher

Re: ICCP for 20,000 gallon STI-P3 UST
Benning Road, Washington, D.C.

Dear Ms. Fletcher,

We've completed our corrosion survey of the above referenced tank. NACE RP-0169-2002 and RP-0285 were used as the testing criteria. A circuit interrupter was connected at the rectifier; "On" and "Instant Off" structure-to-electrolyte potentials were then taken against a Cu-CuSO4 reference cell by contacting the tank bottom through the fill riser. The structure showed potentials that meet the -850 millivolt "Instant Off" criterion, and therefore comply with State and Federal regulations for corrosion mitigation. Specific test values are included on the attached data sheet.

To ensure ongoing protection, it is recommended that the system be monitored annually.

Please let us know if you have any questions, or require further assistance.

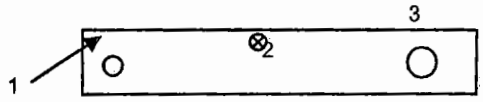
Sincerely,

G. Gillen

Gerald Gillen
NACE Corrosion Technician
Certification #9212

Pasadena, Md. 21123
Phone: (410) 544-3232
Fax: (410) 544-1600

Company:	PEPCO
Location:	3400 Benning RD
	Washington,DC
	Annual Corrosion Survey
	ICCP for 20,000 gal. UST
Contract:	
Date:	9-21-06
Job#:	MA-121
Tester(s)	Guy Denney
Data Sheet	1 of 1



DISPENSERS

	On	Instant off						
Cell Location	Vg (against portable Cu-CuSO4 cell)	Vg (against portable Cu-CuSO4 cell)				Rectifier Settings	Internal Reading	Actu Reac
	millivolts	millivolts						
1	-1417	-960				DCV	14.2V	14.5
2	-1393	-890				DCA	0.375A	0.42
3	-1745	-1008				Taps	D/2	
						Shunt	50mV/2A	10.6m

Attachment 7. UST insuring agreement/financial responsibility endorsement

ASSOCIATED ELECTRIC & GAS INSURANCE SERVICES LIMITED

Endorsement No. 35A / Effective Date of Endorsement October 31, 2006

Attached to and forming part of POLICY No. X2660A1A06

NAMED INSURED Pepco Holdings, Inc.

It is understood and agreed that this POLICY is hereby amended as indicated. All other terms and conditions of this POLICY remain unchanged.

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

DECLARATIONS

Item UST1: A. Name of each covered location:
(See Section 3)

B. Address of each covered location:
(See Section 3)

Item UST2: Policy Number: X2660A1A06

Item UST3: Period of coverage: October 31, 2006 to October 31, 2007

Item UST4: A. Name of Insurer: Associated Electric & Gas Insurance Services Limited

B. Address of Insurer: One Church Street, P.O. Box HM2455, Hamilton, HMJX BERMUDA

Item UST5: A. Name of Insured: Potomac Electric Power Company

B. Address of Insured:
701 Ninth Street, N.W.
Washington, DC 20068

INSURING AGREEMENT

1. This Endorsement certifies that the POLICY to which the Endorsement is attached provides liability insurance covering the underground storage tank(s) listed in Section 3 to this Endorsement for taking corrective action and/or compensating third parties for BODILY INJURY and PROPERTY DAMAGE caused by accidental release; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the POLICY; arising from operating the underground storage tanks identified Section 3.

The limits of liability of the Insurer's liability are:

$1,000,000 each OCCURRENCE; and

$3,000,000 annual aggregate exclusive of legal defense costs, which are subject to a separate limit under the POLICY.

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

This coverage is provided under POLICY No. X2660A1A06
The effective date of said POLICY is October 31, 2006

2. The insurance afforded with respect to such OCCURRENCES is subject to all of the terms and conditions of the POLICY; provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e):

   a. Bankruptcy or insolvency of the INSURED shall not relieve the Insurer of its obligations under the POLICY to which this Endorsement is attached.

   b. The Insurer is liable for the payment of amounts within any deductible applicable to the POLICY to the provider of corrective action or a damaged third-party, with a right of reimbursement by the INSURED for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95 - 280.102.

   c. Whenever requested by a Director of an implementing agency, the Insurer agrees to furnish to the Director a signed duplicate original of the POLICY and all endorsements.

   d. Cancellation or any other termination of the insurance by the Insurer except for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the INSURED. Cancellation for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after expiration of a minimum of ten (10) days after a copy of such written notice is received by the INSURED.

   e. The insurance covers CLAIMS otherwise covered by the POLICY that are reported to the Insurer within six months of the effective date of cancellation or non-renewal of the POLICY except where the new or renewed POLICY has the same retroactive date or a retroactive date earlier than that of the prior POLICY, and which arise out of any covered OCCURRENCE that commenced after the POLICY retroactive date, if applicable, and prior to such POLICY renewal or termination date. CLAIMS reported during such extended reporting period are subject to the terms, conditions, limits, including Limits of Liability, and exclusions of the POLICY.

3.

Name of Covered Location	Address	Number of Tanks
Buzzard Point Generating Station	1st and V Street, SW Washington, D.C. 20024	9
Benning Generating Station	3400 Benning Road, NE Washington, D.C. 20019	11
Howatt Building	1620 2nd Street, SW Washington, D.C. 20006	1
Champlain Substation	2119 Champlain Street, NW Washington, D.C. 20008	1
Van Ness Substation	4000 Van Ness Street Washington, D.C. 20016	1
Irving Substation	1032 Irving Street, NE Washington, D.C. 20018	1

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

Name of Covered Location	Address	Number of Tanks
Alabama Avenue Substation	3302 15th Street, SE Washington, D.C. 20020	1
MARYLAND		
Dickerson Generating Station	21200 Martinsburg Road Dickerson, MD 20753	1
Chalk Point Generating	Eagle Harbor Road Aquasco, MD 20608	11
Defense Mapping Agency	6500 Brooks Lane Washington, D.C. and Sangamore Lane Glen Echo, MD	1
Morgantown Generating Station	P.O. Box Newburg, MD 29795	5
Forestville Production Service Center	8711 Westphalia Road Upper Marlboro, MD 20772	7
Bethesda Substation	4935 Del Ray Avenue Bethesda, MD 20814	1
Brighton Substation	1300 Brighton Dam Road Brighton, MD 20833	1
Possom Point Substation	19000 Brighton Dam Road Dumfries, MD 22026	1
Palmers Corner Substation	3001 Tucker Road Oxon Hill, MD 20744	1
Quince Orchard Substation	1701 Darnestown Road Germantown, MD 20874	1
Bells Mill Substation	10611 Westlake Drive Rockville, MD 20817	4
Oak Grove Substation	3132 Brown Station Road Upper Marlboro, MD 20772	1

AEGIS

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

Name of Covered Location	Address	Number of Tanks
Norbeck Substation	16610 Emory Lane Rockville, MD 20853	1
Bowie Substation	Jericho Park & Lemmons St. Rds. Jericho Park, MD 20715	1
Burches Hills Substation	8101 Surrats Road Clinton, MD 20735	2
Rockville Service Center	1600 Gaither Road Rockville, MD 20850	5
VIRGINIA		
Potomac River Generating Station	1400 North Royal Street Alexander, VA 22314	4

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97 (b) (1) and that the Insurer is eligible to provide insurance as an excess or surplus lines insurer in one or more States.

AEGIS Insurance Services, Inc.
Authorized Representative of:
Associated Electric & Gas Insurance Services Limited
1 Meadowlands Plaza
East Rutherford, New Jersey 07073

_____
Signature of Authorized Representative

"Heather Wright"
<Heather.Wright@erg.com>
06/18/2007 02:00 PM

To Joanne Cassidy/R3/USEPA/US@EPA
cc "Joe Watson" <Joe.Watson@erg.com>
bcc
Subject addendum to PEPCO Kenilworth Report Facility ID 9000745

Hi JoAnne,
I just received an additional piece of documentation for a facility for which you should be receiving the hard copy report today via Fed Ex. The facility is PEPCO Kenilworth, Facility ID #9000745. Attached is a copy of the results for the facility's most recent annual line tightness test in November 2006.

Please let me know if you have any questions.
Thanks,
Heather

****
Heather Wright
Eastern Research Group, Inc.
2300 Wilson Blvd., Suite 350
Arlington, VA 22201-5436
Telephone: 703-841-0547
Fax: 703-841-1440

PEPCOline_tightness_test.pdf

DATA CHART
For Use With
[illegible]

STATION NUMBER Kenilworth DATE Mar 30, 200[illegible]

1 LOCATION: 3400 Benning Road N.E. (Street No. and/or Corner) Washington (City) D.C. (State) 20019 240-375-1412 (Telephone No.)

2 OWNER: PEPCO (Name) (Address) (Representative) (Position) (Telephone No.)

3 OPERATOR: Shirley Paris (Name) (Dealer, Agent or Owner) Same (Address if different from Location) (Telephone No.)

4 REASON FOR TEST: Annual testing

5 TEST REQUESTED BY: Shirley Paris (Name) "PEPCO" (Position) 240-375-1412 (Telephone No.)

6 SPECIAL INSTRUCTIONS:

7 CONTRACTOR OR COMPANY MAKING TEST / MECHANIC(S) NAME: Precision Testing Inc. Charles ? [illegible] #MDP020103?2070

8 IS A TANK TEST TO BE MADE WITH THIS LINE TEST? ☐ YES ☑ NO

9 MAKE AND TYPE OF PUMP OR DISPENSERS (SUCTION OR SUBMERSIBLE): Gasboy Disp / Red Jacket

10 WEATHER: 52° TEMPERATURE IN TANKS ____ °F ____ °C COVER OVER LINES ____ (Concrete, Black Top, etc.) APPROXIMATE BURIAL DEPTH 36"

11 IDENTIFY EACH LINE AS TESTED	12 TIME (MILITARY)	13 LOG OF TEST PROCEDURES, AMBIENT TEMPERATURE, WEATHER, ETC.	14 PRESSURE psi OR kPa		15 VOLUME READING			16 REMARKS SIZE, LENGTH & TYPE OF LINE, & FLEX CONNECTORS CONCLUSIONS, REPAIRS AND COMMENTS
			BEFORE	AFTER	BEFORE	AFTER	NET CHANGE	
	1335	Arrived at site						
	1345	Put line up on 80 PSI						
	1400	Drop line to 60 PSI for test						
Pepco	15	1st	60	60	.023	.023	+.000	
Regular	30	2nd	60	60	.023	.023	+.000	
Disp	45	3rd	60	60	.023	.023	+.000	
#	1500	4th	60	60	.023	.023	+.000	
		Bleed back	60	←	.023	.074	+.051	

18 **TEST RESULTS**

Tests were made on the above line systems in accordance with test procedures prescribed for as detailed on attached test charts with the results as follows:

Line Identification	Meets Criteria	Net Volume Change Per Hour	Date Tested
[illegible] PEPCO	[illegible]	[illegible]	11-30-2006

17 **CONTRACTOR CERTIFICATION**

Technician: [illegible signature]

Signature

Certification #: [illegible]